

From: [Hoffman, Ian S.](#)
To: [Gross, Joel M.](#); [Lewis, Caitlyn R.](#)
Subject: FW: Macias v. Monterrey/ Rule 26(f) Conference
Date: Monday, September 14, 2020 9:30:36 AM

Important e-mail chain

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From: Hoffman, Ian S.
Sent: Thursday, September 10, 2020 4:41 PM
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Subject: RE: Macias v. Monterrey/ Rule 26(f) Conference

Hi Bob -- I still have not heard from you (or your colleagues) in response to my multiple requests that you consent to conducting Mr. Jaime Marquez Esparza's deposition via Zoom due to his location in Mexico. I also have not heard back from you on whether you think court intervention is necessary to resolve this discovery dispute. Accordingly, we are willing to continue the meet and confer process before we involve the Court. Let me know when you are available to discuss this issue further and what your clients' position is on our proposal. If we cannot reach agreement on our proposal, then we can involve the Court.

In the meantime, as we've told you multiple times since receiving the deposition notice, Mr. Esparza is in Mexico and we are unable to produce him for a deposition in Richmond tomorrow. We await your response on our proposal and remain happy to discuss these issues with you at your convenience. If for any reason you believe that involvement of the Court is required today or tomorrow morning, please advise immediately. Thanks.

Ian

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